



State of Utah

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Department of
Environmental Quality

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Executive Director

DIVISION OF WATER QUALITY
Walter L. Baker, P.E.
Director

C/015/032 Incoming
CC: Steve C.
Ken H.

OK

DEC 11 2012

Mr. J. D. Leonard, Engineering Technician
Crandall Canyon Mine
P.O. Box 910
East Carbon, Utah 84520

Dear Mr. Leonard:

Subject: Sampling Issues and Discharge Monitoring Report (DMR) Completion for
Crandall Canyon Mine, UPDES Permit No. UT0024368

We would like to discuss the three following issues with you, please. These issues are concerned with: Whole Effluent Toxicity (WET) testing and limits at the Crandall Canyon Mine (Genwal), quantity calculation for Total Dissolved Solids (TDS) discharged, and its reporting on the DMR, and sampling for pH at Genwal.

As we have discussed on the phone, there have been enough chronic WET test failures at Genwal to cause a second Toxicity Identification Evaluation (TIE) to be necessary. It is our understanding that this has already been started. As such, we request that you please keep the Division of Water Quality (DWQ) informed of the progress of the TIE on, at least, a monthly basis by phone call and, when appropriate, by letter. Please also submit a copy of the final report when that is available. It is our expectation that Genwal will implement those steps identified by the final TIE report to come into compliance with chronic WET requirements.

The quantity of TDS discharged, calculated in tons per day, reported on the June, July and August DMRs for 2012 do not appear to be correct. Please review your calculations and if you concur with this conclusion, please submit amended DMRs showing the correct tonnage of TDS discharged. Please submit the amended DMRs within the next 30 days.

The maximum holding time for a pH sample is 15 minutes prior to analysis. Because of this the pH test is referred to as a field parameter. Based on holding time, taking a sample for pH and sending it to a lab is likely not appropriate, as the holding time would likely be exceeded; unless the lab is located close by, where a sample can be analyzed within 15 minutes after it is gathered. As such, we are interested in your past and present practices for sampling and analyzing for this parameter. Please indicate, therefore, how you have previously monitored and how you presently

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monitor for pH at Genwal.

We are grateful for your efforts and the coordination that we have had in working together. Please respond to this letter within the next 30 days. If you have any questions or concerns please contact me at 801-536-4386 or email me at mherkimer@utah.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michael D. Herkimer".

Michael D. Herkimer, Environmental Scientist
Utah Division of Water Quality

MDH:mc

cc: Daron Haddock, Division of Oil Gas & Mining

DWQ-2012-003923